

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

**Civil Action No. 22-cv-1685**

ROCKY MOUNTAIN GUN OWNERS,  
NATIONAL ASSOCIATION FOR GUN RIGHTS, and  
CHARLES BRADLEY WALKER,

Plaintiffs,

v.

THE TOWN OF SUPERIOR, a Colorado municipality, and  
JOE PELLE, in his capacity as Sheriff of Boulder County, Colorado

Defendant.

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**DECLARATION OF JAMES CURCURUTO**

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1. My name is James Curcuruto.

2. I received my associate's degree in business administration from the State University of New York at Cobleskill in 1991 and my bachelor's degree in business management from the University of North Carolina at Wilmington in 1993. My 30-year business work history has focused primarily on sales, marketing, advertising, research, and analysis. I am currently the Executive Director of Outdoor Stewards of Conservation Foundation.

3. From November 2009 until January 2021, I was the Director, Research and Market Development, at the National Shooting Sports Foundation, Inc. (the "NSSF"). The NSSF, formed in 1961, is the trade association for the firearms, ammunition, hunting, and recreational shooting sports industry. Its mission is to promote, protect and preserve hunting and the shooting sports. The NSSF has a membership of 8,000 manufacturers, distributors, firearms retailers, shooting ranges, sportsmen's organizations, and publishers.

4. In my position as Director, Research and Market Development at the NSSF, I was responsible for most of the research activities at NSSF, and I directed the activities of an internal research manager as well as several outside companies retained to conduct research and gather market and consumer information useful to NSSF members.

5. Under my direction, dozens of informational reports and studies focusing on industry topics and trends, including firearms, ammunition, target shooting, and hunting, were released

to the NSSF member base, and many NSSF reports were shared outside the organization as well. Data from these releases has been referenced many times in endemic, non-endemic, online and print newspaper and magazine articles, used in corporate 10K reports, and mentioned in other media. I have authored and provided information for several articles published in trade magazines.

6. Plaintiffs' counsel has asked me to provide an opinion on (1) the prevalence of AR15 and similar firearms in American society, including rates of ownership of such firearms by law-abiding citizens; and (2) the prevalence of firearm magazines capable of holding more than ten rounds of ammunition in American society, including rates of ownership of such magazines by law-abiding citizens.

7. In summary, (1) between 1990 – 2021, more than 20 million AR-platform rifles have been manufactured in the United States and are owned by millions of persons in the United States and, (2) there are at least one hundred fifty million magazines of a capacity of more than ten rounds in possession of American citizens, commonly used for various lawful purposes including, but not limited to, recreational and competitive target shooting, self-defense, collecting and hunting.

I, James Curcuruto, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that I have reviewed the foregoing, that I am competent to testify in this matter, and that the facts contained therein are true and correct



James Curcuruto

Date: July 13, 2022